

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:

ALL CASES

**DECLARATION OF ANNIE M. WANLESS
IN SUPPORT OF ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE FILED UNDER SEAL**

I, Annie M. Wanless, declare:

1. I am an attorney in the law firm of Lieff, Cabraser, Heimann & Bernstein, LLP. I am a member of the State Bar of California and am admitted to practice before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein

2. Because the materials at issue were designated by Uber as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY", Plaintiffs filed the following under seal:

Document	Description	Designating Party
[Unredacted] C.L. Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] A.R. Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] J.E. Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] LCHB128 Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber

Document	Description	Designating Party
[Unredacted] Jane Doe QLF 001 Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] T.L. Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] B.L. Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] Jaylynn Dean Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] A.R. Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] A.G. Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] K.E. Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] D.J. Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] Amanda Lazio Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] WHB 1486 Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] WHB 318 Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] WHB 1898 Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] WHB 407 Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] WHB 1876 Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] WHB 823 Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber

1 I declare under penalty of perjury that the foregoing is true and correct.

2 Executed on March 14, 2025 in Oakland, California.

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4 /s/ Annie M. Wanless
5 Annie M. Wanless
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